

LOCCKE CORREIA,
LIMSKY & BUKOSKY
Marcia J. Tapia, Esq. (1732)
24 Salem Street
Hackensack, New Jersey 07601
(201)488-0880
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT MURA, TOD J. COLETTA, and
all persons similarly situated,
(See Additional Plaintiffs on
Attachment A),

Plaintiffs,

v.

BOROUGH OF ENGLEWOOD CLIFFS,
a political subdivision of the
State of New Jersey,

Defendant.

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: Civ. Action No.
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Plaintiffs, by their attorneys, Loccke, Correia, Limsky &
Bukosky, complaining of Defendant, respectfully allege as follows:

JURISDICTION AND VENUE

1. Plaintiffs bring this action to recover unpaid compensation and other relief under the provisions of the Fair Labor Standards Act of 1938, as amended [29 U.S.C. § 201-219; hereinafter the "Act" or the "FLSA"].

2. Jurisdiction of this action is conferred upon this Court by section 16(b) of the Act [29 U.S.C. § 216(b)] and by 28 U.S.C. § 1337.

3. Venue of this action is established in this Court by section 16(b) of the Act [29 U.S.C. § 216(b)] and 28 U.S.C. § 1391 (b).

THE PARTIES and CLASS ACTION

4. Plaintiffs are or were employees of the Defendant BOROUGH OF ENGLEWOOD CLIFFS, NEW JERSEY.

5. Pursuant to section 16(b) of the Act, [29 U.S.C. § 216 (b)], Plaintiffs bring this action on behalf of themselves and other employees similarly situated to themselves as described in the claim set forth herein.

6. The Defendant in this action is the BOROUGH OF ENGLEWOOD CLIFFS, NEW JERSEY, and has a place of business at 482 Hudson Terrace, Englewood Cliffs, New Jersey where Plaintiffs are or were employed.

7. Pursuant to section 16(b) of the Act [29 U.S.C. § 216 (b)], the named Plaintiffs herein have executed and filed with the Court their original consents in writing to become party Plaintiffs in this action. Should additional Plaintiffs similarly situated join this action, their consents will be filed with the Court.

8. The Plaintiffs are or were employees who are or were at all relevant times employed in an enterprise engaged in commerce or in the production of goods for commerce, as defined by section 3(s) of the Act [29 U.S.C. § 203(s)]. More specifically, each Plaintiff

is or was a police officer employed by the Defendant.

9. At all relevant times herein, the Plaintiffs have been entitled to the rights, protections, and benefits provided by the Fair Labor Standards Act, or "FLSA."

10. The Defendant Borough of Englewood Cliffs, New Jersey, is an employer as defined by section 3(d) of the Act [29 U.S.C. § 203(d)] and a "public agency" within 29 U.S.C. § 203(x). Upon information and belief, the Defendant at all relevant times has been aware of the provisions of the FLSA, as amended, 29 U.S.C. § 201 *et seq.*

11. The Defendant is an enterprise, as defined by section 3(r) of the Act [29 U.S.C. § 203(r)].

RELEVANT FACTUAL AVERMENTS

12. Plaintiffs are individual members of the Englewood Cliffs PBA Local No. 45.

13. PBA Local No. 45 and the Borough of Englewood Cliffs have completed collective negotiations for a collective bargaining agreement, and are awaiting a decision from an Interest Arbitrator.

14. On or about June 14, 2010, PBA President Scott Mura became aware that the Employer had not been including "longevity pay" into regular pay in order to calculate individual Officer's

"regular rate of pay" for overtime payment purposes.

15. On June 29, 2010, Counsel for the PBA issued correspondence to Borough of Englewood Cliff's Counsel, advising the Borough that failure to include longevity payments into base pay in order to calculate overtime payments is a violation of the Fair Labor Standards Act and its applicable Rules and Regulations. [29, U.S.C. §207 (e); 29 C.F.R. §778-200-255].

16. After a number of telephonic discussions with counsel, on October 29, 2010 issued a proposed settlement agreement with proposed calculations for back pay, from January 2008 to the present.

17. On November 5, 2010, Counsel for the Plaintiffs contacted Borough of Englewood Cliffs Counsel requesting that a Settlement Agreement be drawn for each individual Officer as FLSA rights are individual rights, and thus, the PBA could not settle these individual claims.

18. On November 5, 2010, Plaintiffs' Counsel also alerted Counsel for the Borough of Englewood Cliffs that "holiday pay" which had been rolled into base pay since or about 2005, was also not been used to calculate regular rate of pay to compute overtime pay for individual Officers.

19. On December 8, 2010, Counsel once again contacted Counsel for the Borough of Englewood Cliffs once again requesting

individual settlement agreements and inquiring as to the Defendant's position regarding the Borough's failure to include rolled in holiday pay into base pay for overtime calculations.

20. On December 15, 2010, Counsel for the Borough of Englewood Cliffs responded to Counsel's correspondence requesting legal authority to support Plaintiffs' position that rolled in holiday pay must be included into base pay.

21. Shortly after the receipt of the December 15, 2010 correspondence, Counsel for the Borough of Englewood Cliffs advised Counsel for the Plaintiffs that he would no longer serve as Counsel for the Borough after January 2011, but would seek to resolve this matter prior to that date.

22. On March 7, 2011, Plaintiffs' Counsel contacted new Counsel for the Borough of Englewood Cliffs advising Counsel of the outstanding issues between the parties, and requesting that back pay be issued in regards to the settled issue of longevity.

23. On about April 2011, Counsel for the Borough of Englewood Cliffs and Plaintiffs' Counsel engaged in discussions regarding the issue of holiday pay. Counsel for the Borough of Englewood Cliffs requested that the Plaintiffs provide documentation verifying that holiday pay has been rolled into base pay by the Borough.

24. On April 18, 2011, Plaintiffs' Counsel issued correspondence and documentation to Counsel for the Borough of

Englewood Cliffs verifying that holiday pay was rolled into base pay by the Borough.

25. The Plaintiffs' did not receive a response from Defendant's counsel.

26. On August 8, 2011, representatives for PBA Local No. 45 met with representatives of the Borough of Englewood Cliffs to discuss outstanding grievances. At the end of this meeting Plaintiffs' counsel approached Defendant's counsel seeking a status on the issue of overtime miscalculations. Defendant's counsel indicated that the Defendant will issue retroactive payments and adjust the base pay according, but asked that the Plaintiffs allow additional time to perform retroactive pay calculations.

27. On September 1, 2011, Plaintiffs' counsel issued correspondence to Defendant's counsel seeking a status on the instant matter.

28. Approximately two weeks after issuing the September 1, 2011 correspondence, Plaintiffs' counsel contacted counsel for the Defendant via telephone seeking a response to its September 1, 2011 correspondence. Defendant's counsel asked that the Plaintiff provide them with a copy of the Overtime/Longevity retroactive payment calculations from August 2008 to July 2010, which the Borough had prepared and issued to the Plaintiffs' on or about October 29, 2010.

29. On September 29, 2011 Plaintiffs' counsel forwarded to Defendant's counsel a copy of the requested documents and requested that the Defendant advise the Plaintiffs' as to when the overtime will be properly calculated and when it intends to issue retroactive pay.

30. Plaintiffs' Counsel has consistently attempted to resolve this matter amicably by extending time for counsel and Borough Administration to become acquainted with the issue.

31. A significant period of time has elapsed since Plaintiffs's Counsel contacted Counsel for the Borough of Englewood Cliffs.

32. Regardless of the fact that since or about October 2010, the Borough began properly including longevity pay into base pay for overtime calculations, it has purposely and knowingly failed to issue back pay as per the calculations it issued to Plaintiffs' Counsel.

33. Further, the Borough continues to refuse to include rolled in holiday pay into base pay to determine regular rate of pay for overtime purposes.

34. The Defendant has and continues to willfully violate the Plaintiffs' rights under the Act.

35. The Defendant's actions constitute reckless disregard to

the requirements under the Act.

CLAIM FOR RELIEF (On behalf of all Plaintiffs)

COUNT I

(Miscalculation of Regular Rate of Pay)

36. Plaintiffs hereby repeat, re-allege and fully incorporate all facts set forth in Paragraphs 1 through 35.

37. Employees covered under the Act are entitled to overtime compensation at the rate of one and one-half times their regular rates of pay [29 U.S.C. § 207].

38. The FLSA requires that the regular rate of pay include "all remuneration for employment" paid to, or on behalf of, the employee [29 U.S.C. §207(e)].

39. The regular rate of pay includes the hourly compensation (or equivalent) actually paid to an employee for normal, non-overtime work, otherwise known as "base pay."

40. The FLSA requires that various wage augments, considered remuneration for employment, be included "pro rata" in the regular rate of pay [29 C.F.R. 778.207(b)].

41. The FLSA requires that "longevity pay" be included in regular rate computations.

42. Payments "in lieu of holiday pay" has been held by the U.S. Department of Labor, Wage and Hour Division, and the Courts to be included as part of the FLSA regular rate for overtime purposes when the total value of the holidays is spread across the entire year, and a percentage of that amount is paid in each paycheck.

43. The Defendant, Borough of Englewood Cliffs has refused and continues to refuse to properly calculate regular rate of pay in accordance with the Act.

44. Although the Defendant, Borough of Englewood Cliffs has acknowledged that it has failed to properly calculate regular rate of pay, it refused to issue back pay or adjust regular rate of pay in accordance with the Act.

45. The failure of the Defendant to properly calculate regular rate of pay and issue back pay is a violation of section 7 of the Act [29 U.S.C. § 207]. Such violation is redressable by the Plaintiffs as affected employees under section 16 (b) of the Act [29 U.S.C. § 216 (b)].

46. Defendant, therefore, is liable to the Plaintiffs herein in the amount of Plaintiffs' unpaid compensation and additional amount as liquidated damages, and for reasonable attorney's fees, together with the costs and disbursements of this action.

STATUTE OF LIMITATIONS

47. Plaintiffs hereby repeat, re-allege and fully incorporate all facts set forth in Paragraphs 1 through 46.

48. On information and belief, the failure of Defendant to compensate Plaintiffs as required by the FLSA in each of the claims set forth in this complaint was a knowing, willful and/or reckless violation of section 7 of the Fair Labor Standards Act [29 U.S.C. § 207] within the meaning of the applicable statute of limitations [29 U.S.C. § 255 (a)]. To the extent any of the Plaintiffs' claims fall within the statute of limitations period, Defendant is liable for back pay, liquidated damages, attorney's fees and costs and disbursements of this action.

RECORDS

49. Plaintiffs hereby repeat, re-allege and fully incorporate all facts set forth in Paragraphs 1 through 48.

50. The employment and work records for Plaintiffs are in the exclusive possession, custody and control of the Defendant, and Plaintiffs are unable to state precisely at this time the amounts owing to them without access to and examination of the records. The Defendant is under a duty imposed by 29 U.S.C. section 211 (c) and the regulations of the United States Department of Labor to maintain and preserve payroll and other employment records with respect to Plaintiffs from which some of the amounts of Defendant's liability can be ascertained.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs herein request from the Court the following relief:

(a) An order for a complete and accurate accounting of all the compensation to which the Plaintiffs are entitled;

(b) Judgment against the Defendant awarding each Plaintiff monetary damages in the form of back pay compensation, liquidated damages equal to their unpaid wages, plus appropriate pre-judgment and post-judgment interest;

(c) Reasonable attorney's fees; and

(d) The costs and disbursements of this action together with such other and further relief as the Court deems proper.

By: Marcia J. Tapia /s/ (MJT1732)
Marcia J. Tapia, Esq.

DATED: November 1, 2011

ATTACHMENT A

Cletta, Tod
Drimones, Nicholas
Ershadi, Ethienne
Ford, Colin
Hill, David
Laraia, William
Henkelman, William
Kochis, Steven
McDermott, Gerard
McMorrow, Michael
Morrissey, Daniel
Mura, Scott
Murphy, Brian
Murray, George
Peterson, Ryan
Regan, Timothy
Rice, James
Romano, Gregory
Rushworth, James
Shalhoub, James
Speidel, Douglas
Totten, Benjamin
Tracy, James
Waldt, Ronald
Wicker, Keith

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT MURA, and all
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Plaintiffs,

v.

BOROUGH OF ENGLEWOOD CLIFFS,
a political subdivision of the
State of New Jersey,

Defendant.

Docket No.:

NOTICE OF CONSENT TO BE
PARTY TO SUIT

I, TOD J. COHETTA, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.


SIGNATURE


MAY 27, 2011
DATE

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24 Salem Street
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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State of New Jersey,	:	
	:	
Defendant.	:	

I, Nicholas Drimones hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
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to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.


SIGNATURE

6/2/11
DATE

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I, Ethienne Eshadi, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.

Ethienne Eshadi
SIGNATURE

5/28/11
DATE

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State of New Jersey,	:	
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Defendant.	:	
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I, COVIN V. FORD, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.


SIGNATURE

5/30/2011
DATE

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Attorneys for Plaintiffs

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I, DAVID P. Hill, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.


SIGNATURE

05/27/11
DATE

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UNITED STATES DISTRICT COURT
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I, William Labia hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
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to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.


SIGNATURE

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Defendant.	:	

I, William M. Henkelman, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.

William Henkelman
SIGNATURE

5/31/11
DATE

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UNITED STATES DISTRICT COURT
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I, Steven Kochis, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.


SIGNATURE

5-31-11
DATE

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
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I, Gerard M. DeLong, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
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to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.

SIGNATURE

DATE

5/27/11

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LIMSKY & BUKOSKY
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UNITED STATES DISTRICT COURT
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I, Michael McMorrow, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.

Michael McMorrow
SIGNATURE

5/31/2011
DATE

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
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I, DANIEL MORRISSEY, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.

Daniel Morrissey
SIGNATURE

5/29/11
DATE

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
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I, Scott Mura, hereby consent to become a party to
(print name)
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to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.

Scott I. Mura
SIGNATURE

05/28/2011
DATE

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UNITED STATES DISTRICT COURT
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I, BRIAN MURPHY, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.

Brian Murphy
SIGNATURE

5/28/2011
DATE

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
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I, GEORGE MURRAY, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.

George Murray
SIGNATURE

5-31-2011
DATE

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I, Ryan T. Peterson, hereby consent to become a party to
(print name)
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Scott Mura, to bring such action on my behalf.


SIGNATURE

5/29/2011
DATE

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I, TIMOTHY REGAN, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
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to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.



SIGNATURE

05/31/11

DATE

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I, James M. Rice, hereby consent to become a party to
(print name)
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Scott Mura, to bring such action on my behalf.

SIGNATURE

DATE

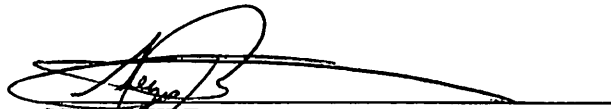
5/29/11

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I, GREGORY ROMANO, hereby consent to become a party to
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the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.


SIGNATURE

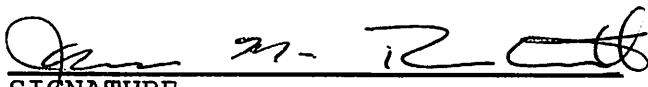
05-29-2011
DATE

LOCCKE, CORREIA
LIMSKY & BUKOSKY
Marcia J. Tapia, Esq. (1732)
24 Salem Street
Hackensack, New Jersey 07601
(201)488-0880
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT MURA, and all	:	
persons similarly situated	:	Docket No.:
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
BOROUGH OF ENGLEWOOD CLIFFS,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	
	:	

I, James M. Rushworth, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.


SIGNATURE

May 27, 2011
DATE

LOCCKE, CORREIA,
LIMSKY & BUKOSKY
Marcia J. Tapia, Esq. (1732)
24 Salem Street
Hackensack, New Jersey 07601
(201)488-0880
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT MURA, and all	:	
persons similarly situated	:	Docket No.:
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
BOROUGH OF ENGLEWOOD CLIFFS,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	
	:	

I, James Sharkovb, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.

James Sharkovb
SIGNATURE

June 2, 2011
DATE

LOCCKE, CORREIA,
LIMSKY & BUKOSKY
Marcia J. Tapia, Esq. (1732)
24 Salem Street
Hackensack, New Jersey 07601
(201)488-0880
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT MURA, and all
persons similarly situated

Plaintiffs,

v.


BOROUGH OF ENGLEWOOD CLIFFS,
a political subdivision of the
State of New Jersey,

Defendant.

Docket No.:

NOTICE OF CONSENT TO BE
PARTY TO SUIT

I, DOUGLAS A. SPEIVCK, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.


SIGNATURE

5-30-2011
DATE

LOCCKE, CORREIA,
LIMSKY & BUKOSKY
Marcia J. Tapia, Esq. (1732)
24 Salem Street
Hackensack, New Jersey 07601
(201)488-0880
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT MURA, and all
persons similarly situated

Plaintiffs,

v.

BOROUGH OF ENGLEWOOD CLIFFS,
a political subdivision of the
State of New Jersey,

Defendant.

Docket No.:

NOTICE OF CONSENT TO BE
PARTY TO SUIT

I, Benjamin Totten, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.

Ben Totten
SIGNATURE

5/31/11
DATE

LOCCKE, CORREIA,
LIMSKY & BUKOSKY
Marcia J. Tapia, Esq. (1732)
24 Salem Street
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(201)488-0880
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT MURA, and all
persons similarly situated

Plaintiffs,

v.

BOROUGH OF ENGLEWOOD CLIFFS,
a political subdivision of the
State of New Jersey,

Defendant.

Docket No.:

NOTICE OF CONSENT TO BE
PARTY TO SUIT

I, JAMES TRACY, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.



SIGNATURE

5/28/2011


DATE

LOCCKE, CORREIA,
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Marcia J. Tapia, Esq. (1732)
24 Salem Street
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(201)488-0880
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT MURA, and all	:	
persons similarly situated	:	Docket No.:
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
BOROUGH OF ENGLEWOOD CLIFFS,	:	NOTICE OF CONSENT TO BE
a political subdivision of the	:	PARTY TO SUIT
State of New Jersey,	:	
	:	
Defendant.	:	
	:	

I, Ronald F. Wadsworth, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.


SIGNATURE

6/1/2011
DATE

LOCCKE, CORREIA,
LIMSKY & BUKOSKY
Marcia J. Tapia, Esq. (1732)
24 Salem Street
Hackensack, New Jersey 07601
(201)488-0880
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT MURA, and all
persons similarly situated

Plaintiffs,

v.

BOROUGH OF ENGLEWOOD CLIFFS,
a political subdivision of the
State of New Jersey,

Defendant.

Docket No.:

NOTICE OF CONSENT TO BE
PARTY TO SUIT

I, KEITH WICKER, hereby consent to become a party to
(print name)
the above referenced Fair Labor Standards Action concerning failure
to properly calculate overtime and/or other compensation pursuant
to 29 U.S.C. § 216 (b) and thereby consent to PBA Representative
Scott Mura, to bring such action on my behalf.

Keith Wicker
SIGNATURE

05-21-2011
DATE